

EXHIBIT 1

From: mgoldenberg@nighgoldenber.com <mgoldenberg@nighgoldenber.com>
Sent: Friday, July 21, 2023 10:32 AM
To: harkinss@gtlaw.com
Cc: ASlater@mazieslater.com; DECValsartan@btlaw.com; valpec@kirtlandpackard.com; araso@nighgoldenber.com; stacy@bartonburrows.com; nmigliaccio@classlawdc.com
Subject: Re: [EXTERNAL] Proposed Discovery Schedule for Losartan and Irbesartan

Steve,

Thanks for the response. We'll put this on the agenda and see what Judge Kugler wants to do. As far as other issues are concerned, I'm not sure if we have any other global issues, though I know all of us are meeting and conferring with our respective defendants on defendant-specific issues. It may be that there will be some defendant-specific issues that pop up within the next week or so.

Thanks,

Marlene

Marlene J. Goldenberg
Founding Partner



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On Thu, Jul 20, 2023 at 4:29 PM <harkinss@gtlaw.com> wrote:

Marlene,

Thanks for following up. As expressed on our last call, Plaintiffs' proposal is unworkable for the relevant manufacturer defendants, particularly those who have not previously engaged in any discovery. Accordingly, we agree this should be placed on the agenda for Judge Vanaskie ahead of the next CMC. Please let us know if you would like to meet and confer on any other global issues ahead of that conference.

Best,

Steven M. Harkins
Shareholder

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From: Marlene Goldenberg <mgoldenberg@nighgoldenberg.com>
Sent: Wednesday, July 19, 2023 3:10 PM
To: Harkins, Steven M. (Shld-ATL-LT) <harkinss@gtlaw.com>
Cc: ASlater@mazieslater.com; DECValsartan@btlaw.com; valpec@kirtlandpackard.com; araso@nighgoldenberg.com; stacy@bartonburrows.com; nmigliaccio@classlawdc.com
Subject: Re: [EXTERNAL] Proposed Discovery Schedule for Losartan and Irbesartan

All,

Just following up on this. Please let us know if you will agree to this schedule or if we should put this on the agenda for the August 1 CMC.

Thanks,

Marlene

Marlene J. Goldenberg

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On Wed, Jul 12, 2023 at 5:39 PM Marlene Goldenberg <mgoldenberg@nighgoldenberg.com> wrote:

Steve,

Thanks for talking with us today. We went back and looked at the schedule after speaking with you all and think that the schedule we sent should be doable for everyone. We also noticed that there is a long time (5 months) set aside for depositions, so we were thinking that we might also want to move that deadline up from May to April. What do you all think?

Finally, I had forgotten that we did not have rebuttal reports last time around, so we should remove that deadline. With that said, I am pasting the schedule below with those small tweaks. Please let us know what you think. We'd like to get this entered as soon as possible so we all have our marching orders.

- August 31, 2023: Deadline to submit disputes regarding written discovery, search terms, and custodians to the Court
- October 31, 2023: Deadline to produce noncustodial documents
- December 31, 2023: Deadline to complete custodial production
- April 30, 2024: Deadline to complete depositions
- July 15, 2024: Deadline for Plaintiffs' expert reports

- August 31, 2024: Defendants' expert reports due
- September 30, 2024: Daubert briefs due

Finally, it is our understanding that all defendants will be responding to written discovery and the 30(b)(6) notices by Friday. We'll set up additional meet and confers with individual defendants again after we get those.

Thanks again,

Marlene

Marlene J. Goldenberg

Founding Partner



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On Tue, Jul 11, 2023 at 10:30 AM Marlene Goldenberg <mgoldenberg@nighgoldenberg.com> wrote:

Steve,

We do not think the schedule needs to be moved this far out, though we are willing to move some things back a bit. Please take a look and let us know what you think:

- August 31, 2023: Deadline to submit disputes regarding written discovery, search terms, and custodians to the Court
- October 31, 2023: Deadline to produce noncustodial documents
- December 31, 2023: Deadline to complete custodial production

- May 31, 2024: Deadline to complete depositions
- July 15, 2024: Deadline for Plaintiffs' expert reports
- August 31, 2024: Defendants' expert reports due
- September 30, 2024: Rebuttal reports due
- November 15, 2024: Daubert briefs due

Thanks,

Marlene

Marlene J. Goldenberg

Founding Partner



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On Mon, Jul 10, 2023 at 3:19 PM <harkinss@gtlaw.com> wrote:

Thank you Adam, and apologies if we missed the earlier confirmation.

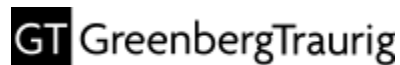
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From: Adam Slater <ASlater@mazieslater.com>

Sent: Monday, July 10, 2023 2:58 PM

To: Harkins, Steven M. (Shld-ATL-LT) <harkinss@gtlaw.com>

Cc: Marlene Goldenberg <mgoldenberg@nighgoldenberglaw.com>; DECValsartan@btlaw.com; Valsartan PEC <valpec@kirtlandpackard.com>; Ashleigh Raso <araso@nighgoldenberglaw.com>; Stacy Burrows <stacy@bartonburrows.com>; nmigliaccio@classlawdc.com

Subject: Re: [EXTERNAL] Proposed Discovery Schedule for Losartan and Irbesartan

Caution: This email originated from outside the Firm.

Hi Steve, I thought that we had already told you that is fine.

Thanks,

Adam Slater

On Jul 10, 2023, at 11:18 AM, harkinss@gtlaw.com wrote:

Following up on the below time sensitive request as to today's deadline – please let us know if Plaintiffs will agree to extend the July 10th deadline to July 14th for all responding manufacturer defendants.

Best,

Steven M. Harkins
Shareholder

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From: Harkins, Steven M. (Shld-ATL-LT)

Sent: Thursday, July 6, 2023 2:16 PM

To: 'Marlene Goldenberg' <mgoldenberg@nighgoldenberglaw.com>; DECValsartan@btlaw.com; Valsartan PEC <valpec@kirtlandpackard.com>

Cc: Ashleigh Raso <araso@nighgoldenberglaw.com>; Stacy Burrows

<stacy@bartonburrows.com>; nmigliaccio@classlawdc.com

Subject: RE: [EXTERNAL] Proposed Discovery Schedule for Losartan and Irbesartan

Counsel,

The losartan/irbesartan manufacturer defendants (we note that separate discussions are taking place with the retailer and wholesaler defendants, and the below proposal is solely on behalf of the relevant manufacturers) have reviewed and discussed plaintiffs' proposed discovery schedule. Per conversations plaintiffs have had with individual manufacturer defendants, we understand that plaintiffs want a single discovery schedule applicable to all responding manufacturers, rather than individualized deadlines for each manufacturer or group of manufacturers. Accordingly, the below proposal takes into account manufacturer defendants who have not previously participated in any written discovery, and will be, among numerous other logistical issues, negotiating custodians and company-specific issues and search terms for the first time.

We also understand that plaintiffs have agreed to extend the written discovery response deadline from July 10th to July 14th for certain manufacturers – as an initial matter please let us know if plaintiffs will agree to that uniform extension for all responding manufacturers.

The manufacturer defendants' proposed discovery schedule is below. We have omitted deadlines for responding to the 30(b)(6) notice, completion of depositions, and expert discovery, as we believe those deadlines should be addressed and set closer to the end of document production. The manufacturer defendants also agree to make productions on a rolling basis, but consistent with the Court's prior orders those productions should not require interim deadlines.

1. **July 14, 2023:** Manufacturer defendants' written responses to discovery due
2. **August 31, 2023:** Deadline to submit disputes regarding written discovery, search terms, and custodians to the Court; outstanding issues to be argued before Judge Vanaskie at the September Biweekly Conference Call
3. **February 1, 2024:** Deadline to produce noncustodial documents
4. **April 30, 2024:** Deadline to complete custodial production

Please let us know if you would like to set a call to discuss.

Best,

Steven M. Harkins
Shareholder

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From: Marlene Goldenberg <mgoldenberg@nighgoldenberg.com>
Sent: Friday, June 30, 2023 12:58 PM
To: DECValsartan@btlaw.com; Valsartan PEC <valpec@kirtlandpackard.com>
Cc: Ashleigh Raso <araso@nighgoldenberg.com>; Stacy Burrows
<stacy@bartonburrows.com>; nmigliaccio@classlawdc.com
Subject: [EXTERNAL] Proposed Discovery Schedule for Losartan and Irbesartan

EXTERNAL TO GT

Caution: This email originated from outside the Firm.

Counsel,

Per our conversation during the macro meet and confer, we are sending a proposed schedule for losartan and irbesartan discovery. We understand the retailers are working with Dave and Layne on one that may slightly differ for them, but this would apply to all other groups of defendants.

Please let us know what you think so we can get this into an order for the court.

- **July 11, 2023:** Defendants' written responses to discovery and 30(b)(6) notices due
- **July 15, 2023:** Defendants to begin producing noncustodial documents on a rolling basis
- **July 31, 2023:** Deadline to submit disputes regarding written discovery, search terms, and custodians to the Court
- **September 30, 2023:** Deadline to produce noncustodial documents
- **October 31, 2023:** Deadline to complete custodial production
- **February 28, 2024:** Deadline to complete depositions
- **May 31, 2024:** Deadline for Plaintiffs' expert reports
- **July 15, 2024:** Defendants' expert reports due
- **August 15, 2024:** Rebuttal reports due
- **October 31, 2024:** Daubert briefs due

Thanks,

Marlene

**Marlene J.
Goldenber
g**

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